

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CASE NUMBER: ~~3~~14-CR-30181-NJR

(M-15-0762-M)

HORACIO SOLIS, JR.,

HECTOR JAVIER VALLES,

JUAN JIMENEZ,

CESAR HERNANDEZ,

RONNIE TURPIN,

DOUGLAS GARRETT,

HOWARD GRANT,

JOEL LOPEZ-ESPERIQUETA, JR.,

-09 JUAN BAZAN,

SAMMIE WHITE,

-11 MARIO LUIS TORRES,

-12 CHARLOTTE KIRKPATRICK,

-13 JEFFREY TORRES,

ROBERT RAMIREZ,

-15 REY RAMIREZ,

-16 ARNOLDO GARZA,

a/k/a "Tamale,"

ARMANDO MEDINA,

-18 SIGIFREDO BAZAN,

a/k/a "Kike,"

HECTOR AVELLANEDA,

a/k/a "H" or "Hector,"

MARCO ANTONIO RODRIGUEZ-

AGUILAR,

a/k/a "Marco A. Aguilar" or "Skinny,"

Defendants.

18 U.S.C. § 2

18 U.S.C. §§ 1952(a)(1), (a)(3)(B), (b)

18 U.S.C. §§ 1956 (a)(1)(B)(i), (a)(3), (h)

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)(ii)(II)

21 U.S.C. § 841(b)(1)(A)(viii)

21 U.S.C. § 841(b)(1)(B)(vii)

21 U.S.C. § 841(b)(1)(B)(viii)

21 U.S.C. § 846

SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT 1

CONSPIRACY TO DISTRIBUTE AND POSSESS WITH INTENT
TO DISTRIBUTE CONTROLLED SUBSTANCES

From an unknown date but at least on or about May 8, 2014, and continuing until on or about September 25, 2014, in St. Clair County, within the Southern District of Illinois, and elsewhere,

HORACIO SOLIS, JR.,
HECTOR JAVIER VALLES,
JUAN JIMENEZ,
CESAR HERNANDEZ,
RONNIE TURPIN,
DOUGLAS GARRETT,
HOWARD GRANT,
JOEL LOPEZ-ESPERIQUETA, JR.,
JUAN BAZAN,
SAMMIE WHITE,
CHARLOTTE KIRKPATRICK,
JEFFREY TORRES,
ROBERT RAMIREZ,
REY RAMIREZ,
ARNOLDO GARZA,
a/k/a "Tamale,"
ARMANDO MEDINA,
SIGIFREDO BAZAN,
a/k/a "Kike,"
HECTOR AVELLANEDA,
a/k/a "H" or "Hector," and
MARCO ANTONIO RODRIGUEZ-AGUILAR,
a/k/a "Marco A. Aguilar" or "Skinny,"

defendants herein, did conspire and agree with each other and others, both known and unknown to the grand jury, to knowingly and intentionally distribute and possess with intent to distribute, controlled substances, namely cocaine, a Schedule II Controlled Substance, methamphetamine, a Schedule II Controlled Substance, marijuana, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(ii)(II) and 841(b)(1)(A)(viii), (b)(1)(B)(vii). All in violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2.

The total amount of cocaine, a Schedule II Controlled Substance, involved in the conspiracy which was reasonably foreseeable to the defendants was 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine.

The total amount of methamphetamine, a Schedule II Controlled Substance, involved in the conspiracy which was reasonably foreseeable to the defendants was 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine.

The total amount of marijuana, a Schedule I Controlled Substance, involved in the conspiracy which was reasonably foreseeable to the defendants was 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana.

COUNT 2
DISTRIBUTION OF METHAMPHETAMINE

On or about May 23, 2014, in St. Clair County, within the Southern District of Illinois, and elsewhere,

HORACIO SOLIS, JR.,
JOEL LOPEZ-ESPERIQUETA, JR., and
JUAN BAZAN,

defendants herein did knowingly and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton Liability*, 328 U.S. 640, 647-48 (1946).

COUNT 3

DISTRIBUTION OF METHAMPHETAMINE

On or about June 6, 2014, in St. Clair County, within the Southern District of Illinois, and elsewhere,

HORACIO SOLIS, JR.,
JOEL LOPEZ-ESPERIQUETA, JR., and
JUAN BAZAN,

defendants herein did knowingly and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii), Title 18, United States Code, Section 2, and *Pinkerton Liability*, 328 U.S. 640, 647-48 (1946).

COUNT 4

DISTRIBUTION OF METHAMPHETAMINE

On or about August 1, 2014, in St. Clair County, within the Southern District of Illinois, and elsewhere,

HORACIO SOLIS, JR.,
JOEL LOPEZ-ESPERIQUETA, JR., and
JUAN BAZAN,

defendants herein did knowingly and intentionally distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii), Title 18, United States Code, Section 2, and *Pinkerton Liability*, 328 U.S. 640, 647-48 (1946).

COUNT 5

DISTRIBUTION OF METHAMPHETAMINE

On or about September 25, 2014, in St. Clair County, within the Southern District of Illinois, and elsewhere,

HORACIO SOLIS, JR.,
HECTOR JAVIER VALLES,
CESAR HERNANDEZ,
RONNIE TURPIN,
DOUGLAS GARRETT,
JOEL LOPEZ-ESPERIQUETA, JR.,
JUAN BAZAN,
HECTOR AVELLANEDA,
a/k/a "H" or "Hector," and
MARCO ANTONIO RODRIGUEZ-AGUILAR,
a/k/a "Marco A. Aguilar" or "Skinny,"

defendants herein did knowingly and intentionally distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii), Title 18, United States Code, Section 2, and *Pinkerton Liability*, 328 U.S. 640, 647-48 (1946).

COUNT 6

INTERSTATE TRAVEL IN AID OF RACKETEERING

On or about September 24, 2014, in Madison County, within the Southern District of Illinois, and elsewhere,

HORACIO SOLIS, JR.,

defendant herein, traveled in interstate commerce from the State of Missouri to the State of Illinois, with the intent to distribute the proceeds of an unlawful activity and with the intent to otherwise promote, manage, and carry on an unlawful activity, namely a business enterprise involving distribution of controlled substances, and thereafter performed and attempted to

perform an act to distribute the proceeds of such unlawful activity and to otherwise promote, manage, and carry on the unlawful activity. All in violation of Title 18, United States Code, Sections 1952(a)(1), 1952(a)(3), and 1952(b).

COUNT 7
MONEY LAUNDERING CONSPIRACY

From an unknown date but at least on or about May 8, 2014, to on or about September 25, 2014, in St. Clair County, within the Southern District of Illinois, and elsewhere,

HORACIO SOLIS, JR.,
JEFFREY TORRES,
MARIO LUIS TORRES,
SAMMIE WHITE, and
JOEL LOPEZ-ESPERIQUETA, JR.,

defendants herein, did knowingly combine, conspire, and agree with each other and with other persons both known and unknown to the Grand Jury, to commit certain offenses: conduct and attempt to conduct a financial transaction affecting interstate commerce that involved the proceeds of a specified unlawful activity, to wit: Conspiracy to Distribute and Possess with the Intent to Distribute Controlled Substances as charged in Count 1 of this Indictment, knowing the transaction was designed in whole or in part to disguise the nature, location, source, ownership, or control of the proceeds of the specified unlawful activity and that while conducting or attempting to conduct such financial transaction knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i). All in violation of Title 18, United States Code, Section 1956(h).

COUNT 8

LAUNDERING OF MONEY INSTRUMENTS (STING PROVISION)

On or about June 13, 2014, in St. Clair County, within the Southern District of Illinois, and elsewhere,

HORACIO SOLIS, JR., and
JEFFREY TORRES,

defendants herein, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of a specified unlawful activity did knowingly conduct and attempt to conduct a financial transaction affecting interstate or foreign commerce involving property represented by a law enforcement officer to be proceeds of a specified unlawful activity, namely distribution of controlled substances. All in violation of Title 18, United States Code, Section 1956(a)(3)(B).

FORFEITURE ALLEGATION

As a result of the commission of the offense described in Counts 1 through Count 6 of this Superseding Indictment,

HORACIO SOLIS, JR.,
HECTOR JAVIER VALLES,
JUAN JIMENEZ,
CESAR HERNANDEZ,
RONNIE TURPIN,
DOUGLAS GARRETT,
HOWARD GRANT,
JOEL LOPEZ-ESPERIQUETA, JR.,
JUAN BAZAN,
SAMMIE WHITE,
CHARLOTTE KIRKPATRICK,
JEFFREY TORRES,
ROBERT RAMIREZ,
REY RAMIREZ,
ARNOLDO GARZA,
a/k/a "Tamale,"

ARMANDO MEDINA,
SIGIFREDO BAZAN,
a/k/a "Kike,"
HECTOR AVELLANEDA,
a/k/a "H" or "Hector," and
MARCO ANTONIO RODRIGUEZ-AGUILAR,
a/k/a "Marco A. Aguilar" or "Skinny,"

defendants herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, 1) any and all property constituting, or derived from, any proceeds said defendants obtained, directly or indirectly, as a result of said violation, and 2) any of the defendants' property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said violation.

A TRUE BILL

FOREPERSON

MONICA A. STUMP
Assistant United States Attorney

STEPHEN R. WIGGINTON
United States Attorney

Recommended Bond: Detention